

# *Anticorruption Policy*



*Making sustainability a smart choice  
for telecom infrastructures*



# Chairman's Message

**Richard THOMAS**  
Chairman

*By joining the United Nations Global Compact, Camusat has committed to complying with various principles regarding Human Rights, the international labor standards and the fight against corruption.*

*Therefore we commit to carrying out our activities with integrity and transparency.  
We will not tolerate corruption.*

*This policy concerns each of us, including those who act on our behalf.*

*Therefore, I am expecting that the behavior of all the managers and co-workers reflect the commitment of Camusat Group to strictly comply with the regulations of fight against corruption.*

# Summary

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# Objectives

*Camusat Group wants to make sure that its activities are carried out in accordance with the provisions of its Ethics Code and with the applicable legal provisions in the countries where we are present.*

*This anticorruption policy, without being exhaustive, aims at communicating to all employees of Camusat Group a referential of principles that must be complied with in the frame of our activities. It also presents the behaviors to ban, being assimilated to actions of corruption / influence peddling.*

*This policy complies with requirements of the French law no. °2016-1691 of December 9, 2016, related to the fight against corruption and the modernization of economic life, also called « Loi Sapin 2 ». Therefore, it has the same value as a conduct code, as stipulated in article 17 of this law. It applies to all our subsidiaries, considering any adaptation imposed by the local laws and regulations.*

*Camusat Group employees have to strictly comply with this anticorruption policy. It must be observed by all stakeholders Camusat is related to, namely: subcontractors, partners, consultants or any intermediates who work for Camusat Group or on its behalf.*

*Managers have the obligation to inform employees about the content and stakes of this policy and to make sure that it is respected.*

*Any breach of this policy may lead to a disciplinary measure which could cause the person's dismissal.*





## **Definition of corruption and influence peddling**

*Corruption is a behavior punishable under criminal law by which a person (the corrupted) asks for, agrees with or accepts a gift, an offering or a promise, presents or advantages of any kind in order to accomplish, delay or omit to accomplish a deed which is directly or indirectly assigned to said person as a duty.*

*This violation has a double scope, as it covers the existence of a corrupted and of a corrupter. Therefore, there is a distinction between active corruption committed by the corrupter, and passive corruption committed by the corrupted.*

*This policy includes the so-called “bribes”, extortions, payments of facilitation and the laundering of all these practices.*

*Influence peddling is the deed, committed by anyone, of demanding or of agreeing, at any time, directly or indirectly, with offers, promises, gifts, presents or all sorts of advantages, for oneself or for another, for abusing or having abused of one’s real or alleged influence in order to obtain from an authority or from the public administration certain distinctions, jobs, businesses or any other favorable decision.*

**Q : What is the difference between corruption and influence peddling?**

*R : The notion of influence peddling is close to that of corruption. The difference consists in the fact that influence peddling needs the presence of a mediator between the potential beneficiary and the public authority, who will use its influence to obtain the desired decision.*

# **Expected or forbidden behaviors to combat corruption**

## **Policy of fight against corruption and against influence peddling**

*No act of corruption and of influence peddling is tolerated within all Camusat Group's subsidiaries.*

*Each employee, for himself or for another third party, or a third party on behalf of an employee, is not allowed to:*

- Carry out, propose or promise payments in cash, services, presents and individual invitations, or any other form of gratification, expecting any kind of advantage in return, or to reward any advantage already granted,*
- Accept or ask for payments in cash, services, presents and individual invitations, or any other form of gratification, expecting any kind of advantage in return, or to reward any advantage already granted,*
- Make a payment for facilitation, directly made by Camusat or indirectly by an intermediate, to facilitate or speed up a routine procedure. This practice is therefore forbidden, except in case of force majeure involving health or life.*

*In any case, the employee will have the obligation to notify any attempt of corruption or of influence peddling, as soon as possible, to his/her manager and to the Ethics Committee. The latter has the responsibility to give an appropriate answer to this situation.*

### **Q : What is payment for facilitation ?**

*R : It is payment made to a public agent in order to execute or speed up any administrative formalities, such as permit requests, clearance of goods, granting of visas, of administrative permits or any other official document, scheduling inspections and/or providing various administrative services.*

# **Expected or forbidden behaviors to combat corruption**

## **Gifts and invitations policy**

*Camusat Group defines its «Gifts and Invitations» policy in order to prevent all risks of corruption. It sets out rules of behavior and ethical standards according to which every employee must demonstrate the highest integrity and thus avoid situations of corruption that would damage the Group's reputation. This policy replaces the former Group Ethical Purchasing Charter.*

*Offering and receiving gifts and invitations may be a simple sign of courtesy that may contribute to establishing, maintaining or developing professional relations often useful for activities carried out by any company. But this may look similar to or may be understood as a deed of active or passive corruption. Therefore, any gift or invitation must be reasonable, proportionate and without any thought of turning back. Transparency is essential.*

*However, offering or receiving a gift or an invitation in an inappropriate manner, particularly with the intention to influence the outcome of a commercial transaction or to obtain any advantage whatsoever in return, is forbidden and may expose the employee and Camusat Group to a violation of our anticorruption policy, as well as of the regulations in force.*

*Actual forbidden examples are presented as follows:*

- Every employee of the Group must refuse receiving or giving gifts in cash,*
- Every employee of the Group must refuse the invitations or gifts from suppliers, subcontractors, distributors, importers, partners, except advertising items with very little value.*

*An exception to this rule may be:*

- Lunches, dinners, drinks, justified by the time and duration of meetings or seminars,*
- Invitations to seminars or events justified by professional reasons.*

*Any employee of the Group that received a gift of a significant value, that s/he could not refuse because they did not want to break the rules of politeness, must inform the manager about it. S/he has to share it with his/her co-workers or send it to any person in charge of CSR within the entity s/he is working in, in order to donate it to charity (CSR approach).*

*Every employee of the Group must make sure that gifts and invitations s/he makes are appropriate, proportionate and in line with the Group's values.*

*Every employee of the Group must make sure that, in the frame of a business relation (suppliers, subcontractors, distributors, importers, partners, etc.), parties are informed of Camusat Group anticorruption policy in terms of gifts and invitations. In the same way, every employee must get informed of the policy implemented by his/her partner.*

*If in doubt, employees must contact their manager or any person in charge of CSR within the entity they are working in.*

***Q : What to do if I already received a gift with a more than symbolic value by post?***

*R : If it is of a significant value, you must send it back to its sender, thank them and tell them politely that accepting it would be against the Group's policy.*

*If it is of a modest value, thank its sender and inform them that henceforth you would no longer be able to accept such a gift; share your gift with your co-workers or send it to a department that would donate it to charity.*

## **Conflict of interests**

*A conflict of interests is that situation when the personal interest of an employee is suspected to be in conflict with Camusat's interests. The conflict of interest initiates ambiguous relations that may generate doubts on the independence of parties and on the objectivity of making decisions.*

*Every employee of the Group must identify the situations of conflict of interests that s/he may be facing and report them to the line manager and/or to the HR representative in order to find the most appropriate solution.*

*No employee of the Group is allowed to take equity interests, regardless of their form, in a trade company controlled by competitors, suppliers or clients of Camusat, without the previous approval of the line manager.*

*It is forbidden to carry out a professional activity outside the Group, without a previous written approval of the hierarchy.*

***Q: My son is the owner of a very good hotel in the area and many companies are using its services for meals and for meetings. For us, it seems an obvious choice to organize an event. Should I however avoid using them, knowing this hotel has competitive prices and provides quality services?***

*R : As regards its competitive prices and its popularity, it may be acceptable that the Company may organize events there. However, you should not participate to the selection of this provider because you clearly are in a situation of conflict of interests. In any situation, when a close relative works for a supplier or for another business partner, current or potential, you must notify it to the line manager. Your manager may then take all measures to avoid putting you in a delicate situation.*



# Implemented measures to combat corruption and influence peddling



## Awareness, information and advice request

*This anticorruption policy is distributed internally and externally by Camusat Group.*

*This anticorruption policy is an integral part of « Camusat Welcome Kit ». In order to raise awareness of the employees that are most exposed to corruption risks, an awareness program is implemented.*

*Any employee who wishes to get an opinion, a piece of advice or who has questions regarding corruption, influence peddling, conflict of interest or more generally Ethics must contact his/her manager or the CSR interlocutor of the entity s/he is working in.*

## Ethics Alert

*Camusat Group has implemented an ethics alert system. Beside violations of Camusat Ethics Code, this system also covers corruption, influence peddling, conflict of interests and all violations or frauds falling within the accounting, internal control and audit fields.*

*The electronic address of this ethics alert system is the following: [ethics.alert@camusat.com](mailto:ethics.alert@camusat.com)*

*The data and information is sent by the initiator of the alert to the Group Ethics Manager and only to him/her. For these purposes, the Person in charge with Ethics within the Group is bound by a reinforced obligation of confidentiality.*

*While preserving the confidentiality of the identity of the person initiating the alert, the Person in charge of Ethics within the Group will make sure during the registration of the alert and later, during their remedy, that s/he will communicate only the data and information necessary to check and to remedy the alert. More generally, any person who is in charge of receiving and/or remedying a professional alert is bound to respect a reinforced obligation of confidentiality, not to use the data and information for wrong purposes.*

*No measure of sanction may be taken against the employee who notified in good faith a violation of this anticorruption policy.*



# **Implemented measures to combat corruption and influence peddling**

## **Risk mapping**

*Camusat Group has implemented a corruption risk mapping which is updated on a regular basis.*

## **Evaluation of third parties**

*Camusat Group carries out and maintains evaluation procedures of its clients, suppliers, subcontractors, mediators and partners.*

## **Internal control**

*Camusat Group carries out and maintains on a regular basis control and internal evaluation procedures in order to ensure the compliance in relation to this anticorruption policy.*

*According to international laws and those applying to Camusat Group, each subsidiary of our Group has to ensure the compliance with its own policies and procedures in terms of prevention of corruption.*

*Moreover, in the frame of its internal control mission, our Internal Audit and Compliance department implements and maintains accounting and operational control procedures aiming at ensuring that no act of corruption and influence peddling occurs.*

*All the accounts, invoices and records related to the transactions with third parties such as clients, suppliers and more generally any business contact must be made available to Internal Auditors.*

*No account should be managed in parallel to facilitate or hide inappropriate transactions.*

*Employees who have to make a payment on behalf of the company must always be aware of its purpose and of its good proportionality regarding a provided product/ service.*

*Each payment must be justified by invoice or receipt. For any question regarding payments, the employee should discuss it with his line manager.*



## ***Responsibilities in the implementation of the anticorruption policy***

*Subsidiaries representatives have the responsibility to make sure that the policy against corruption complies with the laws of the country where the activity is carried out and that each employee respects it as well.*

*Subsidiaries CSR representatives are in charge of the good communication of this policy and the monitoring of its efficiency.*



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